



December 7, 2016

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

Re: WT Docket No. 99-87

Dear Ms. Dortch:

The National Public Safety Telecommunications Council (NPSTC) is a federation of public safety organizations whose mission is to improve public safety communications and interoperability through collaborative leadership. NPSTC pursues the role of resource and advocate for public safety organizations in the United States on matters relating to public safety telecommunications. Accordingly, NPSTC provides guidance on issues that can either negatively impact or benefit the operation of public safety communications. NPSTC recommends the Commission grant the request for waiver of the 6.25 kHz or equivalent efficiency equipment capability requirements in the VHF and UHF bands submitted by the International Municipal Signal Association (IMSA).¹ The IMSA filing raises some valid concerns faced by volunteers in the public safety community.

Under section 90.203(j)(4)-(5) of the rules, the Commission no longer accepts applications for certification of Part 90 radios in the 150-174 MHz and 450-512 MHz bands that cannot operate in a 6.25 kHz or equivalent efficiency mode. There is no corresponding rule requiring licensees actually to operate with an efficiency of 6.25 kHz per channel or equivalent. The rule applies only to equipment capability. However, as noted in the IMSA request for waiver, this 6.25 kHz efficiency requirement essentially prevents manufacturers from offering new radio models that are relatively inexpensive analog FM-only

¹International Municipal Signal Association (IMSA) Request for Waiver, submitted August 19, 2016. The Commission placed the IMSA request on Public Notice, September 26, 2016 under WT Docket No. 99-87.

devices. Meeting the 6.25 kHz or equivalent efficiency capability requirement essentially requires that the radios be digital.

NPSTC certainly does not oppose the provision of digital radios for those segments of the public safety market that need the benefits such radios offer. In fact, NPSTC applauds those manufacturers that have invested in the development of interoperable digital radios for the public safety market. However, NPSTC believes IMSA raises a valid point that there are some segments of the public safety market for which a relatively low cost VHF or UHF analog FM radio would meet their communications requirements. Public safety agencies come in a wide variety of sizes and some are in relatively rural areas while others are in heavily populated urban centers.

Therefore, while public safety entities strive to be interoperable, not all public safety entities have the same overall communications requirements or budget. Many public safety agencies may very well need and can afford digital radio equipment with a full set of features. However, there are volunteers who are part of the public safety community who must fund the purchase of their own radios. For these volunteers, the availability of a low cost radio may mean the difference between some communications or no communications at all. If they cannot afford to be “operable” they certainly will not be interoperable. For example, the National Ski Patrol commented that:

The Commission should encourage interoperable communication by volunteer first responders, by permitting the continued importation of analog-only equipment for those organizations (and their members) that require inexpensive dual-band interoperable radios.²

As noted in the IMSA request for waiver, earlier this year the Commission decided that the required mode of operation on FCC designated VHF and UHF interoperability channels is analog FM. Given that decision, waiving the 6.25 kHz efficiency equipment requirement would have no negative impact on interoperability. A waiver of the rules as IMSA requests, however, could benefit the segment of the public safety market that is very price sensitive and needs only basic communications which analog FM equipment can provide.

In view of the above and the information contained in the record, NPSTC recommends the Commission grant the IMSA request for waiver.

² National Ski Patrol comments, October 27, 2016, at page 3.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Ralph A. Haller", written over a horizontal line.

Ralph A. Haller, Chairman
National Public Safety Telecommunications Council
8191 Southpark Lane, Suite 205
Littleton, Colorado 80120-4641
866-807-4755